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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT
ON STATUS AND RESOLUTION OF
OMNIBUS OBJECTIONS WITH
RESPECT TO CERTAIN CLAIMS**

**[Re: Docket Nos. 9455, 9458, 9460, 9462,
9464, 9466, 9711]**

**Regarding Objections Set for Hearing
March 24, 2021 at 10:00 a.m. (Pacific Time)**

REPORT ON STATUS AND RESOLUTION OF CERTAIN CLAIMS

In advance of the March 24, 2021, 10:00 a.m. omnibus hearing (the “**Hearing**”), PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby report on the status and resolution of certain Claims in the following omnibus claims objections:

Docket No.	Omnibus Objection
9455	<i>Reorganized Debtors’ Fortieth Omnibus Objection to Claims (No Liability / Passthrough Claims) (the “Fortieth Omnibus Objection”)</i>
9458	<i>Reorganized Debtors’ Forty-First Omnibus Objection to Claims (No Liability / Passthrough Claims) (the “Forty-First Omnibus Objection”)</i>
9460	<i>Reorganized Debtors’ Forty-Second Omnibus Objection to Claims (No Liability / Passthrough Claims) (the “Forty-Second Omnibus Objection”)</i>
9462	<i>Reorganized Debtors’ Forty-Third Omnibus Objection to Claims (No Liability / Passthrough Claims) (the “Forty-Third Omnibus Objection”)</i>
9464	<i>Reorganized Debtors’ Forty-Fourth Omnibus Objection to Claims (No Liability / Passthrough Claims) (the “Forty-Fourth Omnibus Objection”)</i>
9466	<i>Reorganized Debtors’ Forty-Fifth Omnibus Objection to Claims (Reduced and Allowed Claims)(the “Forty-Fifth Omnibus Objection”)</i>
9711	<i>Reorganized Debtors’ Forty-Ninth Omnibus Objection to Claims (Untimely No Liability / Passthrough Claims) (the “Forty-Ninth Omnibus Objection”)</i>

The Reorganized Debtors anticipate that the Hearing will go forward with respect to the following Claims, as set forth in more detail below:

- EBEN 818 LLC (Dkt. No. 9617, Clm. No. 3922; Fortieth Omnibus Objection)
- Todd Greenberg (Dkt. No. 9646, Clm. No. 77335; Fortieth Omnibus Objection)
- Martha Gerstner (Dkt. No. 9664, Clm. No. 3524; Fortieth Omnibus Objection)
- D.A. Wood Construction Inc. (Dkt. No. 9666, Clm. No. 8627; Fortieth Omnibus Objection)
- Rhonda Miller (Response attached as Exhibit A, Clm. No. 2948; Fortieth Omnibus Objection)
- Annette Hicks (Response attached as Exhibit B, Clm. No. 9411; Fortieth Omnibus Objection)
- Mark A. Klein, Janet S. Klein (Dkt. No. 9634, Clm. No. 80500; Forty-Second Omnibus Objection)
- G. Larry Engel (Dkt. No. 9653, Clm. No. 80033; Forty-Second Omnibus Objection.)
- Dorcas Wheeler (Dkt. Nos. 9632, 9644, Clm. Nos. 79932, 80179; Forty-Third Omnibus Objection)

- Bruce and Kathleen Shaw (Dkt. No. 9737, Clm. No. 1722; Forty-Third Omnibus Objection)
- Tracy Nick and Haisam Nijem (Dkt. No. 9725, Clm. No. 1934; Forty-Fourth Omnibus Objection)
- John I Weaver (Response attached as Exhibit C, Clm. No. 2932; Forty-Fifth Omnibus Objection)

Docket No.	Claimant	Claim No.	Resolution
Fortieth Omnibus Objection			
9617	EBEN 818 LLC	3922	The Reorganized Debtors contest Claimant's argument regarding liability and damages. As a factual dispute is involved, the Reorganized Debtors request that the Hearing be deemed a status conference under Local Rule 3007-1(b).
9646	Todd Greenberg	77335	The Reorganized Debtors contest Claimant's argument regarding liability and damages. As a factual dispute is involved, the Reorganized Debtors request that the Hearing be deemed a status conference under Local Rule 3007-1(b).
9647	Alan Giberson	8169	The Reorganized Debtors have made a settlement offer to Claimant that remains outstanding. If the Reorganized Debtors do not receive a response, or if a consensual resolution has not been reached in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.
9650	Andrew Etringer	91	The Reorganized Debtors have made a settlement offer to Claimant that remains outstanding. If the Reorganized Debtors do not receive a response, or if a consensual resolution has not been reached in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.
9664	Martha Gerstner	3524	Claimant's response does not change the Reorganized Debtors' assessment that the Debtors do not bear any liability for the alleged damages. The Reorganized Debtors believe it can be resolved as a matter of law under Local Rule 3007-1(b). Accordingly, the Reorganized Debtors are prepared to address the Fortieth Omnibus

Docket No.	Claimant	Claim No.	Resolution
			Objection with respect to this Claim at the Hearing.
9666	D.A. Wood Construction Inc.	8627	The Reorganized Debtors contest Claimant's argument regarding liability and damages. As a factual dispute is involved, the Reorganized Debtors request that the Hearing be deemed a status conference under Local Rule 3007-1(b).
9668	Frank Klassen	4389	The Reorganized Debtors have reached a settlement of this Claim in principle, but Claimant has not yet signed the settlement agreement. If the Reorganized Debtors do not have a fully executed agreement in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.
9669	Phil Piserchio	2017	The Fortieth Omnibus Objection is WITHDRAWN with respect to this Claim.
Informal	Joseph C. Loguidice and Stephanie C. Navarrette-Loguidice	16730	The Fortieth Omnibus Objection is WITHDRAWN with respect to this Claim. It will be allowed as filed.
Informal	Rhonda Miller	2948	Claimant's informal response, attached hereto as Exhibit A , does not state a cognizable theory of liability. The Reorganized Debtors believe it can be resolved as a matter of law under Local Rule 3007-1(b). Accordingly, the Reorganized Debtors are prepared to address the Fortieth Omnibus Objection with respect to this Claim at the Hearing.
Informal	Annette Hicks	9411	Claimant's informal response, attached hereto as Exhibit B , does not state a cognizable theory of liability. The Reorganized Debtors believe it can be resolved as a matter of law under Local Rule 3007-1(b). Accordingly, the Reorganized Debtors are prepared to address the Fortieth Omnibus Objection with respect to this Claim at the Hearing.
Forty-First Omnibus Objection			
10388	Deborah J. & Norman R. Astrin	96351	The Reorganized Debtors have reached a settlement of this Claim in principle, but Claimant has not yet signed the settlement

Docket No.	Claimant	Claim No.	Resolution
			agreement. If the Reorganized Debtors do not have a fully executed agreement in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.
Forty-Second Omnibus Objection			
9634	Mark A. Klein and Janet S. Klein	80500	Claimant's response does not change the Reorganized Debtors' assessment that there is no liability for the alleged damages under Pacific Gas and Electric Company Tariff Electric Rule 14, namely the Public Safety Power Shutoff ("PSPS") program. The Reorganized Debtors believe this Claim can be resolved as a matter of law under Local Rule 3007-1(b). Accordingly, the Reorganized Debtors are prepared to address the Forty-Second Omnibus Objection with respect to this Claim at the Hearing.
9653	G. Larry Engel	80033	Claimant's response does not change the Reorganized Debtors' assessment that there is no liability for the alleged damages under Pacific Gas and Electric Company Tariff Electric Rule 14, namely the PSPS program. The Reorganized Debtors believe it can be resolved as a matter of law under Local Rule 3007-1(b). Accordingly, the Reorganized Debtors are prepared to address the Forty-Second Omnibus Objection with respect to this Claim at the Hearing.
Forty-Third Omnibus Objection			
9628 9629	Rhonda A. Weiss	72	The Reorganized Debtors have reached a settlement of this Claim in principle, but Claimant has not yet signed the settlement agreement. If the Reorganized Debtors do not have a fully executed agreement in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.
9632 9644	Dorcas Wheeler	79932 80179	The Reorganized Debtors contest Claimant's argument regarding liability and damages. As a factual dispute is involved, the Reorganized Debtors request

Docket No.	Claimant	Claim No.	Resolution
			that the Hearing be deemed a status conference under Local Rule 3007-1(b).
9641	Steven J. McDonald	80425	The Reorganized Debtors have reached a settlement of this Claim in principle, but Claimant has not yet signed the settlement agreement. If the Reorganized Debtors do not have a fully executed agreement in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.
9737	Bruce and Kathleen Shaw	1722	The Reorganized Debtors contest Claimant's argument regarding liability and damages. As a factual dispute is involved, the Reorganized Debtors request that the Hearing be deemed a status conference under Local Rule 3007-1(b).
Informal	Roger Drummond	1455	The Reorganized Debtors have made a settlement offer to Claimant that remains outstanding. If the Reorganized Debtors do not receive a response, or if a consensual resolution has not been reached in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.
Informal	Tandra DeBose	7769	The Forty-Third Omnibus Objection is WITHDRAWN with respect to this Claim.
Forty-Fourth Omnibus Objection			
9637	Richard S. Tanner	30916	The Reorganized Debtors have reached a settlement of this Claim in principle, but Claimant has not yet signed the settlement agreement. If the Reorganized Debtors do not have a fully executed agreement in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.
9642 9654	John A. Vos	62490	The Reorganized Debtors have made a settlement offer to Claimant that remains outstanding. If the Reorganized Debtors do not receive a response, or if a consensual resolution has not been reached in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.

Docket No.	Claimant	Claim No.	Resolution
9649	Dean Wills	75943	The Reorganized Debtors have reached a settlement of this Claim that resolves the Forty-Fourth Omnibus Objection.
9663	Gordon Moore	80903	The Reorganized Debtors have reached a settlement of this Claim that resolves the Forty-Fourth Omnibus Objection.
9672	Robert B. Wister	8671	The Reorganized Debtors have made a settlement offer to Claimant that remains outstanding. If the Reorganized Debtors do not receive a response, or if a consensual resolution has not been reached in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.
9725	Tracy Nick and Haisam Nijem	1934	The Reorganized Debtors contest Claimant's argument regarding liability and damages. As a factual dispute is involved, the Reorganized Debtors request that the Hearing be deemed a status conference under Local Rule 3007-1(b).
Forty-Fifth Omnibus Objection			
9619	Shou Kun Huang and Henry Huang	7920	The Reorganized Debtors have made a settlement offer to Claimant that remains outstanding. If the Reorganized Debtors do not receive a response, or if a consensual resolution has not been reached in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.
9627	Maurice Brendan Butler	8625	The Forty-Fifth Omnibus Objection is WITHDRAWN with respect to this Claim.
9660 9662	Gordon N. Ball, Inc. (GNB)	4463	The Reorganized Debtors have reached a settlement of this Claim in principle and a settlement agreement will be prepared and reviewed.. If the Reorganized Debtors do not have a fully executed agreement in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.
Informal	John I Weaver	2932	The Reorganized Debtors contest Claimant's argument regarding damages. As a factual dispute is involved, the Reorganized Debtors request that the

Docket No.	Claimant	Claim No.	Resolution
			Hearing be deemed a status conference under Local Rule 3007-1(b). A true and correct copy of Claimant's informal response to the Reorganized Debtors' counsel is attached hereto as <u>Exhibit C</u> .
Forty-Ninth Omnibus Objection			
Informal	Kevin Rivera	86915	The Reorganized Debtors have reached a settlement of this Claim in principle, but Claimant has not yet signed the settlement agreement. If the Reorganized Debtors do not have a fully executed agreement in advance of the Hearing, the Reorganized Debtors request that it be continued to April 28, 2021 at 10:00 a.m.

DECLARATION REGARDING STATUS AND RESOLUTION OF CLAIMS

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors
2. The foregoing status and resolution of certain Claims is true and correct to the best of my knowledge, information, and belief.
3. Attached hereto as **Exhibit A** is a true and correct copy of the informal response the Reorganized Debtors' counsel received from Rhonda Miller. On March 17, 2021, I contacted Ms. Miller and requested a copy of the supporting documentation referenced therein, but have not yet received a response.
4. Attached hereto as **Exhibit B** is a true and correct copy of the informal response the Reorganized Debtors' counsel received from Annette Hicks (Claim No. 9411).
5. Attached hereto as **Exhibit C** is a true and correct copy of the informal response the Reorganized Debtors' counsel received from John Weaver (Claim No. 2932).
6. This declaration was executed in San Francisco, California.

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1 Dated: March 19, 2021

KELLER BENVENUTTI KIM LLP

2 By: /s/ Dara L. Silveira
3 Dara L. Silveira

4 *Attorneys for Debtors and Reorganized Debtors*